

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

KEYBANK NATIONAL ASSOCIATION)	
)	CASE NO. 1:19-cv-01566
Plaintiff,)	
)	JUDGE SARA LIOI
vs.)	
)	
INTERLOGIC OUTSOURCING, INC., et)	
al.,)	RULE 65(b)(1)(B) CERTIFICATION
)	
Defendants.)	
)	

Pursuant to Fed. R. Civ. P. 65(b)(1)(B), counsel for Plaintiff KeyBank National Association (“KeyBank”) hereby certifies that it has made the following efforts to provide notice to all defendants in this case of KeyBank’s Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. 4) and the relief requested therein:

(1) On July 9, 2019, KeyBank, via its operations division, contacted Defendants Berkshire Bank (“Berkshire”), Wells Fargo Bank, N.A. (“Wells Fargo”), and JPMorgan Chase (“JPMC” and together with Berkshire and Wells Fargo, the “Defendant Banks”) via phone to speak with various departments at the Defendant Banks, including, specifically, the fraud departments. During these phone calls, KeyBank advised the Defendant Banks of the fraudulent wire transfers directed by Defendants Interlogic Outsourcing, Inc. (“Interlogic”) and Najeeb Khan (“Khan”) as well as its intent to file a motion for a temporary restraining order to enjoin disbursement of the funds at issue.

- (2) On July 10, 2019, counsel for KeyBank contacted the General Counsel for Berkshire to advise him of the current litigation and provided him with copies of the Verified First Amended Complaint (Dkt. 3), Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. 4), and all related attachments (collectively, the “Filed Documents”) via email.
- (3) On July 10, 2019, counsel for KeyBank contacted the General Counsel for JPMC to advise her of the current litigation and provided her with copies of the Filed Documents via email.
- (4) On July 10, 2019, counsel for KeyBank contacted counsel for Defendants Interlogic and Khan to advise him of the current litigation and provided him with copies of the Filed Documents via email.
- (5) On July 10, 2019, counsel for KeyBank contacted the corporate office of Wells Fargo in order to speak with Wells Fargo’s counsel; however, the corporate office refused to provide counsel for KeyBank with specific contact information for Wells Fargo’s counsel. No further notice beyond that in Paragraph 1 above should be required.

Accordingly, KeyBank has made great efforts to and has provided notice of the Filed Documents and relief requested therein to the defendants in this litigation. Therefore, no further notice efforts should be required.

Respectfully submitted,

/s/ Steven S. Kaufman

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*Attorneys for Plaintiff KeyBank National
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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Copies of the foregoing were also served via regular mail upon the following:

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1710 Leer Drive
Elkhart, IN 46514-5446

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Edwardsburg, MI 49112

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c/o registered agent
CT Corporation System
155 Federal Street Ste. 700
Boston, MA 02110

WELLS FARGO BANK, N.A.
c/o registered agent
Corporation Service Co.
50 W. Broad St., Ste. 1330
Columbus, OH 43215

JPMORGAN CHASE
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CT Corporation System
4400 Easton Commons Way, Ste. 125
Columbus, OH 43219

/s/ Steven S. Kaufman

*One of the Attorneys for Plaintiff KeyBank
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